<u>REMARKS</u>

This application has been reviewed in light of the Office Action dated March 13, 2008. Claims 1-16 are presented for examination, of which Claims 1 and 9 are in independent form. Claims 1-4 and 9-12 have been amended to define Applicants' invention more clearly. Favorable reconsideration and consideration are requested.

Claims 1-16 were rejected under 35 U.S.C. § 112, first paragraph, as failing to comply with the written description requirement. In particular, the Office Action states that the following limitation in Claims 1 and 9 does not have support in the specification: "a plurality of seller applications operable to store end-purchase information and to populate a message wherein each one of the plurality of seller applications accesses the information through a different interface at the premises of the seller." Applicants submit that this limitation has support in the specification in at least paragraphs [0021] and [0034]. Nonetheless, without conceding the propriety of the rejection, Applicants have carefully reviewed and amended independent Claims 1 and 9, with special attention to the points raised in section 3 of the Office Action. It is believed that the rejection under Section 112, first paragraph, has been obviated, and its withdrawal is therefore respectfully requested.

The Office Action states that Claims 1, 2, 4, 7-10, 12, 15, and 16 are rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 5,798,508 (*Walker et al.*) in view of U.S. Patent No. 5,999,938 (*Bliss et al.*) in further view of U.S. Patent No. 5,941,954 (*Kalajan*); Claims 3 and 11 are rejected under 35 U.S.C. § 103(a) as being unpatentable over *Walker et al.*, in view of *Bliss et al.*, in further view of *Kalajan*, and in further view of U.S. Patent No. 7,165,239 (*Hejlsberg et al.*); and Claims 5, 6, 13, and 14 are rejected under 35 U.S.C. § 103(a) as being unpatentable over *Walker et al.*, in

view of *Bliss et al.*, in further view of *Kalajan*, and in further view of U.S. Patent Appln. Pub. No. 2003/0195762 (*Gleason et al.*). Applicants submit that independent Claims 1 and 9, together with the claims dependent thereon, are patentably distinct from the cited prior art for at least the following reasons.

Among other notable features of Claim 1 is "a proxy application coupled between the seller application and the supplier application, wherein the proxy application is configured to . . . update communication software to communicate between the seller application and the supplier application." By virtue of this feature, a supplier is able to seamlessly upgrade its connections to multiple sellers without having to manually update each individual seller in communication with the supplier application. Furthermore, using a proxy application to update communication software makes supplier applications transparent to seller applications. *See* Specification, paragraphs [0029] and [0030].

*Walker et al.* relates to a system and method for issuing and clearing traveler's checks that are paid for by credit card. Apparently, the traveler checks are issued but are not paid for until they are used.

Nothing has been found by Applicants in *Walker et al.* that would teach, suggest, or otherwise result in "a proxy application coupled between the seller application and the supplier application, wherein the proxy application is configured to . . . update communication software to communicate between the seller application and the supplier application," as recited in Claim 1. Accordingly, Applicants submit that Claim 1 is patentable over *Walker et al.*

*Kalajan*, as best understood by Applicants, relates to a method for redirecting communication on a network between a client and a network resource. A

software program listens to a client communications port and redirects a message received on the communications port to the network resource. Apparently, *Kalajan* teaches a proxy application that can encrypt and decrypt messages.

Applicants have found nothing in *Kalajan* that would teach, suggest, or otherwise result in "a proxy application coupled between the seller application and the supplier application, wherein the proxy application is configured to . . . update communication software to communicate between the seller application and the supplier application," as recited in Claim 1. Accordingly, Applicants submit that Claim 1 is patentable over *Kalajan*.

A review of the other art of record has failed to reveal anything which, in Applicants' view, would remedy the deficiencies of *Walker et al.* and *Kalajan* as applied against the independent claims herein. Accordingly, Applicants submit that any combination of *Walker et al.*, *Bliss et al.*, *Kalajan*, *Hejlsberg et al.*, and *Gleason et al.*, assuming such a combination would even be permissible, would fail to teach or suggest "a proxy application coupled between the seller application and the supplier application, wherein the proxy application is configured to . . . update communication software to communicate between the seller application and the supplier application," as recited in Claim 1.

Accordingly, Applicants submit that Claim 1 is patentable over the cited art, and respectfully request withdrawal of the rejection under 35 U.S.C. § 103(a). Independent Claim 9 includes a feature similar to that discussed above in connection with Claim 1. Therefore, Claim 9 also is believed to be patentable for at least the same reasons as discussed above.

The other rejected claims in this application depend from one or another of the independent claims discussed above and, therefore, are submitted to be patentable for at least the same reasons. Since each dependent claim is also deemed to define an additional aspect of the invention, individual reconsideration of the patentability of each claim on its own merits is respectfully requested.

In view of the foregoing amendments and remarks, Applicants respectfully request favorable reconsideration and early passage to issue of the present application.

No petition to extend the time for response to the Office Action is deemed necessary for the this Amendment. If, however, such a petition is required to make this Amendment timely filed, then this paper should be considered such a petition and the Commissioner is authorized to charge the requisite petition fee to Deposit Account 50-3939.

Applicants' undersigned attorney may be reached in our New York Office by telephone at (212) 218-2100. All correspondence should continue to be directed to our address listed below.

Respectfully submitted,

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